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Hearing Date: August 8, 2013
Time: 11:30 am

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re IMAGE RENT A CAR, INC.,

Chapter 7
Case No. 1-11-42390 NHL

Debtor.

Adv. Pro. No. 12-01288 (NHL)

-----X

GREGORY MESSER, ESQ., as Trustee of the
Estate of Image Rent A Car., Inc.,

-against-

SCHNEIOR ZILBERMAN, ADIR GROUP, INC.
ADIR RENT A CAR, INC., ADIR PLAZA, INCL,
GROUP TRAVEL SOLUTION, INC., AND
GAD SEBAG

**NOTICE OF DIGBY ADLER GROUP, LLC d/b/a BANDAGO’S (A) OPPOSITION TO
PROPOSED SETTLEMENT AGREEMENT AND (B) IN SUPPORT
OF CROSS-MOTION TO DISMISS CHAPTER 7 CASE**

PLEASE TAKE NOTICE that upon the affidavit of Sharky Laguna, CEO of Digby of Digby Adler Group LLC d/b/a/ Bandago (“Digby”) and exhibits thereto, Digby hereby (a) objects to the entry of an order approving the Trustee’s proposed settlement with Defendants, and (b) files this cross motion to dismiss the Debtor’s case and the case of Van Rental Co., (“Van Rental, and collectively with the Debtor, the “Debtors”) for cause, pursuant to 11 U.S.C. §707 (a) and will proceed before the Honorable Nancy H. Lord, at the United States Bankruptcy Court, Eastern District of New York, located at 271 Cadman Plaza East, Brooklyn, New York 11201 on

August 8, 2013 at 11:30 am or as soon thereafter as counsel may be heard, for the entry of an order denying the proposed settlement agreement and/or granting the dismissal of the Debtor's case for cause.

PLEASE TAKE FURTHER NOTICE, that responsive papers or objections, if any, to the relief sought in the motion shall be in writing, shall set forth with specificity the grounds therefore, and be filed electronically with the Bankruptcy Court (with a courtesy copy to the Chambers of the Honorable Lord), and served upon the undersigned counsel for Digby Adler Group, LLC in accordance with the applicable Bankruptcy and Local Rules.

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than the announcement of such an adjournment in open Court.

Dated: New York, New York
July 31, 2013

By: /s/ Barbie D. Lieber
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